

## **EXHIBIT A**

Ms. Mary Godwin

June 8, 2016

**PREBILL****Attention:**

File #: 13839

Inv #: Sample

**RE:** Godwin, Mary v. Wellstar Health System

| <b>DATE</b> | <b>ENTRY #</b> | <b>DESCRIPTION</b>   | <b>HOURS</b> | <b>AMOUNT</b> | <b>LAWYER</b> |
|-------------|----------------|--|--------------|---------------|---------------|
| Mar-18-16   | 340203         | Concluded preparation of fee petition, brief, and declaration in support.  | 3.50         | 1,837.50      | EB            |
| Mar-18-16   | 338487         | Review and finalize table of ancillary costs   | 1.00         | 375.00        | RB            |
| Mar-18-16   | 338488         | Review and finalize fee petition notice of motion and brief in support including incorporating EDB edits   | 1.50         | 562.50        | RB            |
| Mar-18-16   | 338489         | Review and make edits to attorney time in support of fee petition  | 2.30         | 862.50        | RB            |
| Mar-18-16   | 338490         | File motion for equitable relief on ECF  | 0.20         | 75.00         | RB            |
| Mar-18-16   | 338491         | Finalize all exhibits for filing for fee petition briefing   | 0.20         | 75.00         | RB            |
| Mar-18-16   | 338492         | Emails with Wymer and Coffman re declarations in support of fee petition   | 0.20         | 75.00         | RB            |
| Mar-18-16   | 346599         | Work on Bill of Costs, Table of Ancillary Expenses, identify and organize supporting documentation (3.6); revise spreadsheets, ensure all entries to Bill of Costs and Ancillary Expenses are in line with each year's entries to firm's system, finalize, including o/cs with GP (1.7). Several meetings with EDB, RB, FM, GP re ensuring all postings are up-to-date and reflect any revisions(.9); t/cs to LTS and go through each invoice to ensure all received (.4). | 6.60         | 990.00        | PR            |
| Mar-21-16   | 346587         | Confer with PR and review draft notice to file corrected bill of costs.  | 0.20         | 75.00         | RB            |
| Mar-21-16   | 338980         | Redact as necessary and prepare notice of substitution of Bill of Costs and Attachment A (Table of Ancillary   | 1.20         | 180.00        | PR            |

Expenses) to Motion for Fees and Expenses, t/c with clerk, efile same.

|           |        |  |      |          |    |
|-----------|--------|--|------|----------|----|
| Mar-21-16 | 342358 | T/c with clerk (.2); redact as necessary and prepare notice of substitution of Bill of Costs and Attachment A (Table of Ancillary Expenses) to Motion for Fees and Expenses, efile same (1.0). | 1.20 | 180.00   | PR |
| Apr-04-16 | 346589 | Discuss new motions filed by defense with EDB  | 0.40 | 150.00   | RB |
| Apr-04-16 | 341066 | Legal research on attorneys fees for focus groups for purposes of responding to Defendant's opposition to fee petition   | 0.40 | 150.00   | RB |
| Apr-05-16 | 341073 | Read Defendant's response to Plaintiff's Motion for Award of Attorney's Fees and Expenses and take notes on same   | 0.40 | 150.00   | RB |
| Apr-05-16 | 341075 | Begin drafting reply brief in support of Plaintiff's motion for attorneys fees and costs   | 1.60 | 600.00   | RB |
| Apr-06-16 | 346591 | Continue drafting reply brief in support of Plaintiff's motion for attorneys fees and conduct legal research re: same.   | 4.70 | 1,762.50 | RB |
| Apr-06-16 | 341087 | Read and take notes on Defendant's Response to Plaintiff's Motion for Equitable Relief   | 0.40 | 150.00   | RB |
| Apr-06-16 | 341088 | Read cases cited by Defendant in support of their opposition to front pay  | 0.50 | 187.50   | RB |
| Apr-07-16 | 341095 | Review and edit reply motion re: attorneys fees and expenses   | 0.80 | 300.00   | RB |
| Apr-07-16 | 341096 | Conduct legal research to support front pay claim  | 0.90 | 337.50   | RB |
| Apr-10-16 | 341115 | Draft reply in support of motion for equitable tolling   | 1.80 | 675.00   | RB |
| Apr-13-16 | 341144 | Conduct research, review court transcript, and finalize reply brief in support of equitable motion for front pay   | 2.10 | 787.50   | RB |
| Apr-14-16 | 341152 | Read Def's memorandum of law in support of its renewed motion for judgment as a matter of law  | 0.70 | 262.50   | RB |
| Apr-14-16 | 341325 | Begin drafting response to motion for judgment as a matter of law  | 2.00 | 750.00   | RB |

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|-----------|--------|---|------|----------|----|
| Apr-14-16 | 341326 | Review transcript to assist with drafting of response to Def's motion for judgment as a matter of law   | 1.20 | 450.00   | RB |
| Apr-16-16 | 346590 | Confer w/RB re: Defendant's motions in retrial, judgement as matter of law & opposition to front pay request.                                     | 0.40 | 210.00   | EB |
| Apr-16-16 | 341812 | Continue drafting response to Def's motion for judgment as a matter of law  | 4.30 | 1,612.50 | RB |
| Apr-17-16 | 341814 | Review and revise response to Def's motion for judgment as a matter of law  | 1.30 | 487.50   | RB |
| Apr-18-16 | 341946 | Reviewed and edited draft reply to response to petition for fees.   | 0.50 | 262.50   | EB |
| Apr-18-16 | 341947 | Reviewed and edited briefing on front pay.  | 0.70 | 367.50   | EB |
| Apr-18-16 | 341816 | Incorporate EDB edits into reply motion in support of front pay request   | 0.20 | 75.00    | RB |
| Apr-18-16 | 341817 | Incorporate EDB edits to reply motion in support of request for attorneys   | 0.20 | 75.00    | RB |
| Apr-18-16 | 341818 | Read Defendant's memo of law in support of its motion for a new trial   | 0.60 | 225.00   | RB |
| Apr-18-16 | 341819 | Speak with client re status of case and post-trial motions  | 0.40 | 150.00   | RB |
| Apr-18-16 | 341820 | Review and revise Plaintiff's response to Defendant's Motion for Judgment as a Matter of Law  | 0.90 | 337.50   | RB |
| Apr-18-16 | 341821 | Begin drafting response to Defendant's Motion for a New Trial   | 3.10 | 1,162.50 | RB |
| Apr-19-16 | 341836 | Continue drafting response to Defendant's Motion for a New Trial  | 6.40 | 2,400.00 | RB |
| Apr-19-16 | 342465 | Begin identifying trial transcript citations for responses, email exchanges with RB.  | 3.80 | 570.00   | PR |
| Apr-20-16 | 346592 | Reviewed and edited briefing on motion for judgment as a matter of law.   | 2.20 | 1,155.00 | EB |
| Apr-20-16 | 341842 | Review and revise response to Defendant's Motion for a New Trial  | 4.40 | 1,650.00 | RB |
| Apr-20-16 | 341843 | Review trial transcript and insert proper citations to support response briefs to Motion for New Trial and Motion for Judgment as a Matter of Law | 1.90 | 712.50   | RB |

|           |        |  |       |             |    |
|-----------|--------|--|-------|-------------|----|
| Apr-20-16 | 342466 | Identify and input trial transcript citations for responsive pleadings for RB.   | 6.30  | 945.00      | PR |
| Apr-21-16 | 346594 | Review of response to motion for new trial and edited response to the same.  | 2.50  | 1,312.50    | EB |
| Apr-21-16 | 341853 | Review EDB edits to motion for a new trial. Proofread and finalize brief for filing.   | 2.50  | 937.50      | RB |
| Apr-21-16 | 341854 | Proofread and finalize response brief in opposition to Def's Motion for Judgment as a Matter of Law to file on ECF.  | 2.10  | 787.50      | RB |
| Apr-28-16 | 342661 | Begin working on motion for additional attny fees due to post-trial briefing   | 1.30  | 487.50      | RB |
| May-03-16 | 343903 | Continue drafting supplemental fee petition and conduct legal research re same.  | 1.80  | 675.00      | RB |
| May-10-16 | 343936 | Read Defendant's reply brief in support of its motion for a new trial  | 0.40  | 150.00      | RB |
| May-10-16 | 343937 | Read Defendant's reply brief in support of its motion for judgment as a matter of law  | 0.50  | 187.50      | RB |
| Jun-06-16 | 346673 | S/w EDB re supplemental brief requesting attorneys fees  | 0.20  | 80.00       | RB |
| Jun-07-16 | 346595 | Review and edit itemized statement in support of attorney fees and costs, brief in support of Plaintiff's supplemental motion for fees and costs.                  | 1.00  | 525.00      | EB |
| Jun-07-16 | 346598 | Preparation of supplemental Declaration in support of Petition for Supplemental Fees and Costs.  | 0.50  | 262.50      | EB |
| Jun-07-16 | 346680 | Review EDB supplemental declaration in support of supplemental fee petition (.2) and incorporate EDB edits to motion in support of supplemental fee petition (.2). | 0.40  | 160.00      | RB |
| Totals    |        |  | 86.80 | \$29,962.50 |    |

**FEE SUMMARY:**

| Lawyer            | Hours | Effective Rate | Amount      |
|-------------------|-------|----------------|-------------|
| Edward D. Buckley | 11.30 | \$525.00       | \$5,932.50  |
| Rachel Berlin     | 56.40 | \$375.27       | \$21,165.00 |
| Pam Rymin         | 19.10 | \$150.00       | \$2,865.00  |

**DISBURSEMENTS**

|  | <b>Disbursements</b> | <b>Receipts</b>    |
|--|----------------------|--------------------|
| Mar-23-16 338586N Marrone - transcript 2/29 - 3/4, Inv<br>#20160065 (M Godwin) | 745.20               |                    |
|  | <hr/>                | <hr/>              |
| Totals   | \$745.20             | \$0.00             |
|  |                      | <hr/>              |
| <b>Total Fees, Disbursements</b>   |                      | <b>\$30,707.70</b> |

